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6 Attorneys for Plaintiff  
United States of America  
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IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 JOSE GUADALUPE LOPEZ-ZAMORA,  
LEONARDO FLORES BELTRAN,  
CHRISTIAN ANTHONY ROMERO,  
JOAQUIN ALBERTO SOTELO VALDEZ,  
ERIKA GABRIELA ZAMORA ROJO,  
JOSE LUIS AGUILAR SAUCEDO, and  
ROSARIO ZAMORA ROJO,  
18 Defendants.

CASE NO. 2:21-CR-0007-DAD  
STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
[PROPOSED] ORDER  
DATE: December 13, 2022  
TIME: 9:30 a.m.  
COURT: Hon. Dale A. Drozd

20 STIPULATION

21 Plaintiff United States of America, by and through its counsel of record, and the above-captioned  
22 defendants, by and through their respective counsel of record, hereby stipulate as follows:

23 1. By previous order, this matter was set for status on December 13, 2022.  
24 2. By this stipulation, defendants now move to continue the status conference until March  
25 28, 2023, and to exclude time between December 13, 2022, and March 28, 2023, under Local Codes T2  
and T4.  
27 3. The parties agree and stipulate, and request that the Court find the following:  
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1           a)       The grand jury returned an indictment in this case on January 28, 2021. Fourteen  
2 defendants are named in the publicly filed indictment. The names of two additional defendants  
3 who have not yet been arrested are redacted from the publicly filed indictment.

4           b)       On May 11, 2021, the Court signed an order substituting attorney Kresta Daly as  
5 counsel of record for defendant Christian Romero. ECF No. 162.

6           c)       On January 4, 2022, defendant Rosario Zamora Rojo made his initial appearance  
7 on a criminal complaint. *See* 2:21-MJ-00153-DB, ECF No. 5.

8           d)       On March 3, 2022, the grand jury returned a superseding indictment adding  
9 Rosario Zamora Rojo as a defendant and adding a money-laundering conspiracy charge against  
10 defendants Jose Lopez-Zamora and Erika Zamora Rojo. ECF No. 276.

11          e)       On December 5, 2022, the Court signed an order substituting attorney Jennifer  
12 Mouzis as new counsel of record for defendant Erika Gabriela Zamora Rojo, in place of attorney  
13 Martin Tejeda. ECF No. 408.

14          f)       The government has represented that the discovery associated with this case to  
15 date includes approximately 8,252 pages of materials, including investigative reports,  
16 photographs, search warrant materials, and other documents, as well as voluminous audio and  
17 video recordings and approximately 978 recorded phone calls intercepted pursuant to the Title III  
18 wiretap in this case. All of this discovery has been either produced directly to counsel and/or  
19 made available for inspection and copying.

20          g)       Counsel for defendants need additional time to review the voluminous discovery  
21 in this case, to conduct independent factual investigation, to research trial and sentencing issues,  
22 to consult with their clients, and to otherwise prepare for trial. In particular, attorney Jennifer  
23 Mouzis, who was substituted as new counsel of record for defendant Erika Gabriela Zamora  
24 Rojo on December 5, 2022, needs time to review the voluminous discovery in this case, consult  
25 with her client, and otherwise prepare for trial.

26          h)       Counsel for defendants believe that failure to grant the above-requested  
27 continuance would deny them the reasonable time necessary for effective preparation, taking into  
28 account the exercise of due diligence.

1           i)     The government does not object to the continuance.

2           j)     In addition, this case is “complex” within the meaning of 18 U.S.C.

3               § 3161(h)(7)(A), B(ii) [Local Code T2], as this Court previously found in its February 10, 2021  
4               Order (ECF No. 103) and subsequent orders.

5           k)     Based on the above-stated findings, the ends of justice served by continuing the  
6               case as requested outweigh the interest of the public and the defendant in a trial within the  
7               original date prescribed by the Speedy Trial Act.

8           l)     For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
9               et seq., within which trial must commence, the time period of December 13, 2022 to March 28,  
10              2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code  
11              T4] and 18 U.S.C. § 3161(h)(7)(A), B(ii) [Local Code T2] because it results from a continuance  
12              granted by the Court at defendant’s request on the basis of the Court’s finding that the ends of  
13              justice served by taking such action outweigh the best interest of the public and the defendant in  
14              a speedy trial.

15          4.       Nothing in this stipulation and order shall preclude a finding that other provisions of the  
16              Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
17              must commence.

18          IT IS SO STIPULATED.

1 Dated: December 6, 2022

PHILLIP A. TALBERT  
United States Attorney

5 Dated: December 6, 2022

/s/ DAVID W. SPENCER  
DAVID W. SPENCER  
Assistant United States Attorney

6 Dated: December 6, 2022

/s/ Todd D. Leras  
Todd D. Leras  
Counsel for Defendant  
JOSE GUADALUPE LOPEZ-  
ZAMORA

7 Dated: December 6, 2022

/s/ Christopher R. Cosca  
Christopher R. Cosca  
Counsel for Defendant  
LEONARDO FLORES BELTRAN

8 Dated: December 6, 2022

/s/ Kresta N. Daly  
Kresta N. Daly  
Counsel for Defendant  
CHRISTIAN ANTHONY ROMERO

9 Dated: December 6, 2022

/s/ Michael D. Long  
Michael D. Long  
Counsel for Defendant  
JOAQUIN ALBERTO SOTELO  
VALDEZ

10 Dated: December 6, 2022

/s/ Jennifer Mouzis  
Jennifer Mouzis  
Counsel for Defendant  
ERIKA GABRIELA ZAMORA ROJO

11 Dated: December 6, 2022

/s/ Dina L. Santos  
Dina L. Santos  
Counsel for Defendant  
JOSE LUIS AGUILAR SAUCEDO

12 Dated: December 6, 2022

/s/ Shari Rusk  
Shari Rusk  
Counsel for Defendant  
ROSARIO ZAMORA ROJO

1                   **[PROPOSED] FINDINGS AND ORDER**

2                   IT IS SO FOUND AND ORDERED this \_\_\_\_ day of \_\_\_\_\_, \_\_\_\_.

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**THE HONORABLE DALE A. DROZD**  
5                   UNITED STATES DISTRICT JUDGE

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